Stillman

Exhibit 7

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- -X
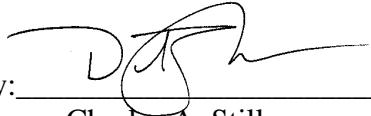   :

DAN HARKABI,   :   Index No.: 08-CV-8203(WHP)(THK)
GIDON ELAZAR,   :

                 :

          Plaintiffs,   :

                 :

        vs.   :   **NOTICE OF DEPOSITION**
                 :   **PURSUANT TO**
SANDISK CORPORATION,   :   **FED. R. CIV. P. 30(B)(6)**
                 :

          Defendant.   :

- -X

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6) and 45, plaintiffs will

take the deposition(s) upon oral examination, to be recorded by stenographic means and

videotape, at the offices of Stillman, Friedman & Shechtman, P.C., 425 Park Avenue, New York,

NY 10022, of SanDisk Corporation ("SanDisk"). SanDisk is requested to designate the person or

persons most knowledgeable and prepared to testify on behalf of SanDisk concerning the subject

matter described in Attachment A hereto. The designated witness or witnesses shall produce in

advance of the deposition, no later than May 7, 2009 at 9:30 a.m., the documents described in

Attachment B. The deposition(s) will commence at 9:30 a.m. on May 14, 2009. If necessary,

each deposition will be adjourned until completed.

Dated: New York, New York
      April 16, 2009

STILLMAN, FRIEDMAN &
SHECHTMAN, P.C.

By:_____
     Charles A. Stillman
     James A. Mitchell
     Daniel V. Shapiro

425 Park Avenue
New York, New York 10022
(212) 223-0200
Counsel for Plaintiffs Harkabi and Elazar

TO: Charles Bachman
      O'Melveney & Myers LLP
      Times Square Tower
      7 Times Square
      New York, NY 10036
      Counsel for SanDisk Corporation

Attachment A

Unless otherwise stated, the relevant time period for each subject matter listed on

Attachment A is January 1, 2004 to present.

1) Any and all efforts undertaken by SanDisk to implement a litigation hold in response to plaintiffs' March 7, 2007 letter, attached hereto as Exhibit 1.

2) Whether and how email belonging to the following custodians has been lost or destroyed by SanDisk: Dan Harkabi, Gidi Elazar, Steve Nedeels, Tony Awal, and Orna Zarfati.

3) All efforts undertaken by SanDisk to date to respond to plaintiffs' document requests, including the process that was undertaken by SanDisk to search for and preserve relevant hard copy and electronic documents, including the creation of the report provided to plaintiffs on April 13, 2009 by counsel for SanDisk, attached hereto as Exhibit 2.

4) The process SanDisk had in place for archiving hard copy documents and electronic materials (including email) before and after 2007 as referenced in counsel for SanDisk's April 14, 2009 email, attached hereto as Exhibit 3.

5) The process SanDisk follows to retrieve the information on an employee's computer and/or laptop after they leave the company as referenced in counsel for SanDisk's April 14, 2009 email, attached hereto as Exhibit 3.

6) The process SanDisk undertook to preserve the files of Dan Harkabi and Gidi Elazar when they left the employment of SanDisk.

7) The current and any prior system(s) used to create, transmit, store, retrieve, and delete email including, but not limited to, name and version, installation dates, number of users, and location of users' mail files.

8) Acquisition, location, and disposition of personal computers used by employees and others and any systems for recording such information.

9) The chain of custody of hardware and software, including processes when an employee leaves, and replacement and repair of equipment.

10) How physical and electronic documents are maintained, archived, indexed, including descriptions of hardware and software used, and where this is physically located.

11) Electronic and paper records management and/or retention policies and procedures.

12) Corporate policies regarding employee use of company computers, software, e-mail and data.

13) The process for the retention of backup data and information as to how and where such data is stored.

Attachment B

The designated witness or witnesses shall produce in advance of the deposition, no later

than May 7, 2009 at 9:30 a.m., the following documents:

1) All documents which the deponent(s) plans to consult or relied upon in preparation for the deposition.

2) All document retention plans, technical manuals, network architecture diagrams, instructions, policies, booklets, memoranda, or guidelines to employees regarding the systems in use at SanDisk since January 1, 2004.

EXHIBIT 1

quinn emanuel trial lawyers | silicon valley

555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065 | TEL 650-801-5000 FAX 650-801-5100

March 7, 2007

VIA ELECTRONIC AND FIRST CLASS MAIL

Megan Comport
Vice President and Associate General Counsel
SanDisk Corporation
601 McCarthy Boulevard
Milpitas, CA 95035

Re: Dan Harkabi, Gidon Elazar and MDRM Technologies

Dear Ms. Comport:

We represent Dan Harkabi, Gidon Elazar and MDRM Technologies.

It has come to our attention that SanDisk is in breach of numerous legal obligations towards our clients. Among other things, SanDisk is in breach of its obligation to pay the full amount of the earn-out provision of the Amended and Restated Stock Purchase Agreement dated September 13, 2004 (SPA). It has also recently terminated our clients in retaliation for their complaints about this and other conduct by SanDisk, and for other pretextual reasons.

We understand that our clients have been working to resolve the issue of the earn-out since June of 2006 by meeting with and/or providing documentation to senior management, including Eli Harari, Yoram Cedar and yourself. At this point, because SanDisk appears unwilling to make any good faith attempt to resolve this issue, and particularly in light of SanDisk's recent termination of our clients, Messrs. Harkabi and Elazar have no choice but to escalate this dispute. Accordingly, please be advised that we are invoking their rights under Article 9(e)(ii) of the SPA regarding dispute resolution. By contract, SanDisk and our clients are required to engage in a one-day mediation with an impartial mediator on or before April 6, 2007. We will propose a

number of impartial mediators as well as available dates to hold this mediation by the end of the week. We ask that you review this information and provide us with your selection or alternative names and dates no later than Wednesday, March 14, 2007.

In light of this dispute and the prospect of litigation, it is critically important that you retain all documents that in any way relate to these issues. Please consider this letter formal notice that you retain and preserve all copies of all documents, whether in hard or soft copy (including but not limited to emails, correspondence, presentations, notes, videotapes, etc.) that relate in any way to Dan Harkabi, Gidon Elazar, MDRM, or the MDRM Technology and/or its Derivatives, including but not limited to:

> (1.) emails and other correspondence to or from Messrs. Harkabi and Elazar, MDRM or any members of the Secure Content Solutions (SCS) team;

> (2.) all documents that refer in any way to Messrs. Harkabi and Elazar, MDRM or the SCS team;

> (3.) all documents that refer in any way to the MDRM Technology and/or Derivatives thereof, as defined in the SPA;

> (4.) all documents that refer or relate to the acquisition of MDRM, including but not limited to correspondence (for example correspondence by and/or between Eli Harrari, Rich Chernicoff, Cathy Lego and Yoram Cedar), draft agreements, business modeling, and technical and business evaluations or considerations;

> (5.) all documents that refer or relate to any debate or discussion at SanDisk about an earn-out with MDRM, including but not limited to correspondence, notes, and emails by and/or between Eli Harari, Rich Chernicoff, Cathy Lego and Yoram Cedar;

> (6.) all development, training, product, marketing, accounting, sales and finance documents that refer or relate to any products that use or embed the MDRM Technology and/or its Derivatives, including but not limited to the U3, SanGo, Cruzer Freedom, Cruzer Loop, and Trusted Flash from 2004 to the present;

> (7.) all documents, including DVDs and CDs or other means of electronic storage, that refer or relate to SanDisk's vision for and prospects for the MDRM Technology and/or its Derivatives;

> (8.) all documents that refer or relate to the "Emerging Markets" organization within SanDisk, including but not limited to business justifications, business plans, organizational charts and documents that refer to the reasons for the formation of such organization and the reasons this organization was disbanded or reorganized;

> (9.) all documents that refer or relate to the Device Management System (DMS), including but not limited to all correspondence, technical and business evaluations or considerations; organizational charts, meeting minutes, notes and documentation regarding the functionality and technology to be developed or incorporated into products by the DMS program;

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(10.) all documents that refer or relate to the efforts to incorporate, use or embed the MDRM Technology and/or its Derivatives on other devices, including all documents that track such attempts and refer or relate to the reason such attempts were or were not successful;

(11.) all documents that refer or relate to manufacturing U3 devices and/or downloading data onto U3 devices, including documents resident in China and other locations outside of the United States; all hardware and software that is used to or in anyway facilitates the download of data onto U3 devices from 2004 to the present;

(12.) all documents that refer or relate to sales and marketing efforts to promote the MDRM Technology and/or its Derivatives, including the U3, San Go, Cruzer Freedom, Cruzer Loop, and Trusted Flash, as well as all documents that refer or relate to any effort to impede, slow down or interfere with the sales and marketing of such products or products incorporating such technology, including email, internal meeting summaries, notes and memoranda, customer meeting notes and memoranda, documents sufficient to identify the persons involved in such efforts, and financial information such as budgeting, price lists and costs from 2004 to the present;

(13.) all employment reviews and objectives for Messrs. Harkabi and Elazar;

(14.) all documents that refer or relate to SanDisk's participation in or presentations at conferences from 2004 to the present that refer or relate in any way to the U3 device, including but not limited to its technical features and capabilities; .

(15.) all correspondence (such as emails), meeting minutes and presentations that refer or relate to Product Line Meetings (PLM) and staff meetings of Yoram Cedar from 2004 to the present;

(16.) all documents that refer or relate in any way to the Amended and Restated Stock Purchase Agreement between SanDisk, MDRM, Inc. and other parties dated September 13, 2004, including all documents regarding their negotiation, termination, and terms, obligations under those agreements, including the fulfillment of those obligations, and documents sent to third parties regarding SanDisk's relationship with Messrs. Harkabi, Elazar and/or MDRM;

(17.) all documents that refer or relate to any other agreements between SanDisk and any of Messrs. Harkabi, Elazar and/or MDRM, including but not limited to any employment, escrow or stock repurchase agreements;

(18.) all documents that refer or relate to "Booklocker" or any technology that uses or embeds any of the technology in Booklocker in whole or in part;

(19.) all documents that refer or relate to the escrow agent for the earn-out, including but not limited to any communications with the same;

(20.) all documents that refer or relate to the employment of Messrs. Harkabi and Elazar, including but not limited to their personnel files, performance reviews, compensation, and any employment action with respect to them, including termination;

(21.) all documents that refer or relate to the reduction in force by SanDisk on our about March 1, 2007;

(22.) all public disclosures, including but not limited to press releases, securities filings, communications made to analysts, regarding the acquisition of MDRM, the MDRM technology, and the reduction in force of March 1, 2007; and

(23.) all documents that refer or relate to U3 (the company) and/or M-Systems regarding the U3 program, including documents that refer or relate to engineering of the U3 product, such as security, certificates, keys, sessions, serial numbers, serialization, product identification, loading data into products as a step of their manufacturing, product manufacturing process, and amount of time per device in the manufacturing equipment.
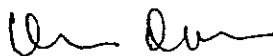
We also ask that you retain all email, documents and computers (including laptops) of Messrs. Harkabi, Elazar and any member of the SCS team, the SanDisk U3 program team members (including Carlos Gonzales and Henry Huton), the SanDisk Trusted Flash Team members (including Farshid Sabet, Bahman Q., and Alson Kemp), and the SanDisk Engineering team of U3 and Trusted Flash (including Micky Holtzman, Sean Chang, and Simon Stolero), whether currently or formerly employed at SanDisk, and not re-image, write over or otherwise destroy or compromise any electronic data for such individuals.

Destruction or alteration of any such documents or electronic materials is undoubtedly a violation of SanDisk's Code of Ethics and Business Conduct. Moreover, destruction or alteration of any such documents or electronic materials may subject SanDisk and any individuals involved, to contempt of court or other civil and criminal penalties.

We look forward to receiving your response to our list of mediators no later than Wednesday, March 14, 2007. Thank you in advance for your compliance with these important requests. Please feel to contact me if you have any questions or wish to discuss this matter.

Very truly yours,

QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

Diane M. Doolittle
Co-Chair, National Trial Practice Group

cc: Claude M. Stern

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EXHIBIT 2

Title

Contents

Notes

Caution

About Cont

Control Disco
intellectual p

Contact Us

For more info

Control Discove
355 Melrose Av
San Francisco,
Tel 415-334-97
jim.barrick@c
www.controld

Control Discove
Discovery, Inc

Version A

Control Discovery
Proven Solutions for Electronic Discovery

Harkabi v. SanDisk Custodian Keyword Report

Summary Report
Search Criteria Report
Custodian Detail Reports (17)

1. There was no email recovered for four custodians and therefore no Custodian Detail reports. (Names are noted
2. The keyword totals listed in the Summary and 17 Custodian Detail reports tabulate all occurrences of each key
3. Custodian Detail reports list only keywords with one or more occurrences. Keywords with zero occurrences are
4. Keywords omitted from the Summary report were not found in any custodians data.

1. Please remember to make backup copies of this Excel file before attempting to sort columns.
2. Always select (highlight) all data in a worksheet before sorting a particular column or data corruption will occur.

trol Discovery

very offers a wide range of information risk management services designed to help enterprise clients manage
roperty security, litigation readiness, and electronic discovery.

rmation about Control Discovery, please contact us:

ery, Inc.
venue
, CA 94127
700
controldiscovery.com
liscovery.com

4/13/2009, 745am

d in the Criteria Report)
word.
e omitted.

Harkabi v. SanDisk
Summary of Keyword Results

Keyword	Keyword Usage - All Custodians	Andy Tomlin	Percent
ADIR	22,021	3,583	2.77%
API	40,279	12,222	9.44%
book NEAR(2) locker	267	22	0.02%
BookLocker	4,070	78	0.06%
Cruzer	52,608	1,620	1.25%
Danh	50	0	0.00%
device NEAR ID	6,192	1,609	1.24%
device NEAR identification	537	78	0.06%
device NEAR identifier	165	18	0.01%
Discretix	6,345	1,462	1.13%
earn NEAR(2) out	692	0	0.00%
Earnout	538	0	0.00%
earn-out	426	0	0.00%
Elazar	6,933	865	0.67%
emerging NEAR market	5,786	192	0.15%
FCP	10,212	655	0.51%
Firmware	196,980	77,185	59.61%
Flashcp	2,905	81	0.06%
Gidi	8,399	1,015	0.78%
Gidie	46	5	0.00%
Gidon	668	10	0.01%
gold	10,776	440	0.34%
Harkabi	15,287	608	0.47%
manufacturing NEAR flow	2,142	69	0.05%
MDRM	9,784	168	0.13%
SanGo	4,849	104	0.08%
SCS	19,848	1,075	0.83%
Secure NEAR content	6,478	268	0.21%
SPA	12,787	320	0.25%
U3	181,520	10,369	8.01%
USB	247,271	15,367	11.87%
Total Keyword Occurrences	876,861	129,488	100.00%

Avi Shmuel	Percent	Carlos Gonzales	Percent	Cathy Lego	Percent	Eli Harari
367	1.24%	1,982	2.84%	1	0.17%	519
2,160	7.30%	2,512	3.60%	19	3.14%	1,519
38	0.13%	6	0.01%	0	0.00%	0
409	1.38%	881	1.26%	9	1.49%	185
402	1.36%	4,063	5.82%	41	6.78%	3,046
1	0.00%	1	0.00%	0	0.00%	12
573	1.94%	1,055	1.51%	0	0.00%	32
23	0.08%	64	0.09%	0	0.00%	25
12	0.04%	23	0.03%	0	0.00%	3
381	1.29%	277	0.40%	0	0.00%	168
0	0.00%	6	0.01%	16	2.64%	58
0	0.00%	14	0.02%	7	1.16%	32
0	0.00%	3	0.00%	10	1.65%	41
927	3.13%	377	0.54%	7	1.16%	480
142	0.48%	639	0.92%	28	4.63%	864
732	2.47%	734	1.05%	11	1.82%	1,067
6,991	23.62%	16,062	23.00%	51	8.43%	3,692
594	2.01%	920	1.32%	0	0.00%	60
1,229	4.15%	478	0.68%	2	0.33%	428
14	0.05%	4	0.01%	0	0.00%	0
11	0.04%	6	0.01%	6	0.99%	113
117	0.40%	588	0.84%	12	1.98%	914
551	1.86%	1,285	1.84%	20	3.31%	1,469
133	0.45%	388	0.56%	0	0.00%	35
186	0.63%	198	0.28%	29	4.79%	340
662	2.24%	84	0.12%	0	0.00%	19
1,927	6.51%	1,336	1.91%	20	3.31%	1,721
888	3.00%	244	0.35%	17	2.81%	504
94	0.32%	1,621	2.32%	9	1.49%	1,262
3,999	13.51%	17,416	24.94%	176	29.09%	18,300
6,035	20.39%	16,569	23.73%	114	18.84%	21,069
29,598	100.00%	69,836	100.00%	605	100.00%	57,977

Percent	Gidon Elazar	Percent	Judy Bruner	Percent	Kevin Zhang	Percent
0.90%	0	0.00%	1,334	1.35%	5,497	4.34%
2.62%	0	0.00%	1,876	1.90%	2,223	1.75%
0.00%	0	0.00%	21	0.02%	117	0.09%
0.32%	0	0.00%	532	0.54%	329	0.26%
5.25%	0	0.00%	7,409	7.51%	13,367	10.55%
0.02%	0	0.00%	4	0.00%	3	0.00%
0.06%	0	0.00%	21	0.02%	762	0.60%
0.04%	0	0.00%	34	0.03%	43	0.03%
0.01%	0	0.00%	0	0.00%	12	0.01%
0.29%	0	0.00%	444	0.45%	276	0.22%
0.10%	0	0.00%	250	0.25%	0	0.00%
0.06%	0	0.00%	215	0.22%	0	0.00%
0.07%	0	0.00%	156	0.16%	0	0.00%
0.83%	5	27.78%	836	0.85%	214	0.17%
1.49%	0	0.00%	1,295	1.31%	0	0.00%
1.84%	0	0.00%	1,261	1.28%	1,500	1.18%
6.37%	0	0.00%	6,563	6.66%	17,181	13.56%
0.10%	0	0.00%	95	0.10%	169	0.13%
0.74%	3	16.67%	712	0.72%	551	0.43%
0.00%	0	0.00%	2	0.00%	3	0.00%
0.19%	4	22.22%	209	0.21%	0	0.00%
1.58%	0	0.00%	969	0.98%	687	0.54%
2.53%	4	22.22%	4,118	4.18%	66	0.05%
0.06%	0	0.00%	96	0.10%	616	0.49%
0.59%	0	0.00%	2,824	2.86%	3,310	2.61%
0.03%	0	0.00%	60	0.06%	1,626	1.28%
2.97%	2	11.11%	4,938	5.01%	1,041	0.82%
0.87%	0	0.00%	757	0.77%	251	0.20%
2.18%	0	0.00%	3,227	3.27%	307	0.24%
31.56%	0	0.00%	29,577	30.00%	23,268	18.37%
36.34%	0	0.00%	28,770	29.18%	53,275	42.05%
100.00%	18	100.00%	98,605	100.00%	126,694	100.00%

Megan Comport	Percent	Micky Holtzman	Percent	Mike Morganstern
38	0.28%	423	1.99%	3,713
347	2.52%	2,153	10.11%	822
5	0.04%	3	0.01%	0
70	0.51%	110	0.52%	618
914	6.64%	456	2.14%	8,914
1	0.01%	4	0.02%	2
9	0.07%	471	2.21%	23
2	0.01%	97	0.46%	4
0	0.00%	62	0.29%	1
40	0.29%	689	3.23%	3
268	1.95%	1	0.00%	0
158	1.15%	5	0.02%	0
151	1.10%	1	0.00%	0
298	2.16%	578	2.71%	102
189	1.37%	230	1.08%	97
198	1.44%	228	1.07%	471
657	4.77%	3,781	17.75%	10,056
21	0.15%	53	0.25%	578
312	2.27%	675	3.17%	105
4	0.03%	5	0.02%	0
110	0.80%	16	0.08%	2
284	2.06%	409	1.92%	2,798
627	4.55%	563	2.64%	523
35	0.25%	207	0.97%	24
1,118	8.12%	73	0.34%	26
29	0.21%	71	0.33%	1,731
473	3.43%	682	3.20%	409
391	2.84%	769	3.61%	39
633	4.60%	145	0.68%	1,164
3,630	26.36%	3,751	17.61%	15,969
2,761	20.05%	4,595	21.57%	23,084
13,773	100.00%	21,306	100.00%	71,278

Percent	Nelson Chan	Percent	Rich Chernicoff	Percent	Sanjay Mehrotra
5.21%	191	1.43%	4	0.38%	758
1.15%	352	2.63%	8	0.77%	1,507
0.00%	19	0.14%	0	0.00%	1
0.87%	143	1.07%	41	3.92%	187
12.51%	1,374	10.27%	10	0.96%	4,792
0.00%	3	0.02%	0	0.00%	7
0.03%	8	0.06%	0	0.00%	38
0.01%	16	0.12%	0	0.00%	64
0.00%	2	0.01%	0	0.00%	4
0.00%	33	0.25%	16	1.53%	129
0.00%	5	0.04%	3	0.29%	34
0.00%	6	0.04%	0	0.00%	26
0.00%	2	0.01%	3	0.29%	15
0.14%	292	2.18%	53	5.07%	423
0.14%	226	1.69%	1	0.10%	803
0.66%	189	1.41%	0	0.00%	1,074
14.11%	875	6.54%	10	0.96%	8,729
0.81%	48	0.36%	0	0.00%	63
0.15%	298	2.23%	104	9.95%	397
0.00%	0	0.00%	0	0.00%	0
0.00%	10	0.07%	2	0.19%	82
3.93%	630	4.71%	6	0.57%	950
0.73%	922	6.89%	131	12.54%	1,502
0.03%	2	0.01%	2	0.19%	48
0.04%	107	0.80%	328	31.39%	252
2.43%	22	0.16%	0	0.00%	49
0.57%	424	3.17%	14	1.34%	1,815
0.05%	144	1.08%	15	1.44%	415
1.63%	621	4.64%	48	4.59%	1,659
22.40%	2,502	18.70%	178	17.03%	19,678
32.39%	3,914	29.25%	68	6.51%	27,584
100.00%	13,380	100.00%	1,045	100.00%	73,085

Percent	Sean Chang	Percent	Vladimir Zininberg	Percent	Yoram Cedar
1.04%	1,467	2.96%	960	2.17%	1,184
2.06%	5,841	11.77%	4,891	11.04%	1,827
0.00%	11	0.02%	14	0.03%	10
0.26%	99	0.20%	165	0.37%	214
6.56%	414	0.83%	909	2.05%	4,877
0.01%	0	0.00%	0	0.00%	12
0.05%	395	0.80%	1,040	2.35%	156
0.09%	14	0.03%	28	0.06%	45
0.01%	6	0.01%	10	0.02%	12
0.18%	1,305	2.63%	696	1.57%	426
0.05%	1	0.00%	2	0.00%	48
0.04%	11	0.02%	18	0.04%	46
0.02%	1	0.00%	2	0.00%	41
0.58%	405	0.82%	359	0.81%	712
1.10%	77	0.16%	351	0.79%	652
1.47%	868	1.75%	471	1.06%	753
11.94%	22,501	45.33%	10,581	23.87%	12,065
0.09%	47	0.09%	78	0.18%	98
0.54%	534	1.08%	776	1.75%	780
0.00%	5	0.01%	2	0.00%	2
0.11%	2	0.00%	0	0.00%	85
1.30%	259	0.52%	815	1.84%	898
2.06%	294	0.59%	36	0.08%	2,568
0.07%	17	0.03%	381	0.86%	89
0.34%	158	0.32%	183	0.41%	484
0.07%	56	0.11%	258	0.58%	78
2.48%	372	0.75%	1,065	2.40%	2,534
0.57%	52	0.10%	928	2.09%	796
2.27%	149	0.30%	255	0.58%	1,273
26.92%	6,233	12.56%	6,129	13.83%	20,345
37.74%	8,049	16.21%	12,919	29.15%	23,098
100.00%	49,643	100.00%	44,322	100.00%	76,208

Percent

1.55%
2.40%
0.01%
0.28%
6.40%
0.02%
0.20%
0.06%
0.02%
0.56%
0.06%
0.06%
0.05%
0.93%
0.86%
0.99%
15.83%
0.13%
1.02%
0.00%
0.11%
1.18%
3.37%
0.12%
0.64%
0.10%
3.33%
1.04%
1.67%
26.70%
30.31%

100.00%

Harkabi v. SanDisk
Search Criteria

Primary Custodians	**Notes**
Rich Chernicoff	
Gidon Elazar	
Nelson Chan	
Megan Comport	
Cathy Lego	
Micky Holtzman	
Carlos Gonzalez	(Special Search Criteria)
Eli Harari	
Yoram Cedar	
Daniel Harkabi	(No Report - No email located)
Steve Nedeels	(No Report - No email located)
Tony Awal	(No Report - No email located)
Avi Shmuel	

Secondary Custodians	**Notes**
Judy Bruner	
Chih-Hsiung (Sean) Chang	
Sanjay Mehrotra	
Mike Morganstern	
Andy Tomlin	
Orna Zarfati	(No Report - No email located)
Kevin Zhang	
Vladimir Zininberg	

Search Terms	**Notes**
ADIR	(Use for All Custodians)
API	(Use for All Custodians)
book NEAR(2) locker	(Use for All Custodians)
BookLocker	(Use for All Custodians)
Cruzer	(Use for All Custodians)
Danh	(Use for All Custodians)
device NEAR(3) ID	(Use for All Custodians)
device NEAR(3) identifier	(Use for All Custodians)
device NEAR(3) identification	(Use for All Custodians)
Discretix	(Use for All Custodians)
earn NEAR(2) out	(Use for All Custodians)
Earnout	(Use for All Custodians)
earn-out	(Use for All Custodians)
Elazar	(Use for All Custodians)
emerging NEAR(3) market	(Use for All Custodians)
FCP	(Use for All Custodians)
Firmware	(Use for All Custodians)

Flashcp	(Use for All Custodians)
Gidi	(Use for All Custodians)
Gidie	(Use for All Custodians)
Gidon	(Use for All Custodians)
gold	(Use for All Custodians)
Harkabi	(Use for All Custodians)
manufacturing NEAR(3) flow	(Use for All Custodians)
MDRM	(Use for All Custodians)
SanGo	(Use for All Custodians)
SCS	(Use for All Custodians)
Secure NEAR(3) content	(Use for All Custodians)
SPA	(Use for All Custodians)
U3	(Use for All Custodians)
USB	(Use for All Custodians)
USB AND KEY	(Use for All Custodians)
firmware AND cruzer	(Add for Carlos Gonzales Only)
firmware AND freedom	(Add for Carlos Gonzales Only)
firmware AND booklocker	(Add for Carlos Gonzales Only)
firmware AND U3	(Add for Carlos Gonzales Only)
firmware AND SanGo	(Add for Carlos Gonzales Only)

Date Range   **Notes**

1/1/2004 through 12/31/2008

Harkabi v. SanDisk
Andy Tomlin Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	546	1,063	0	0	1,609
MDRM	64	104	0	0	168
Secure NEAR content	204	64	0	0	268
Elazar	826	39	0	0	865
Gidi	935	80	0	0	1,015
Gidie	0	5	0	0	5
SCS	460	615	0	0	1,075
SanGo	51	53	0	0	104
emerging NEAR market	129	63	0	0	192
FCP	246	409	0	0	655
API	10,115	2,107	0	0	12,222
Gidon	6	4	0	0	10
BookLocker	50	28	0	0	78
ADIR	2,716	867	0	0	3,583
Flashcp	61	20	0	0	81
USB	10,231	5,136	0	0	15,367
device NEAR identifier	1	17	0	0	18
manufacturing NEAR flow	40	29	0	0	69
book NEAR(2) locker	10	12	0	0	22
device NEAR identification	1	77	0	0	78
Cruzer	894	726	0	0	1,620
U3	3,438	6,931	0	0	10,369
SPA	28	292	0	0	320
Discretix	1,258	204	0	0	1,462
Harkabi	572	36	0	0	608
Firmware	70,663	6,522	0	0	77,185
gold	309	131	0	0	440

Harkabi v. SanDisk
Avi Shmuel Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	216	357	0	0	573
Cruzer	247	155	0	0	402
Secure NEAR content	500	388	0	0	888
Elazar	911	16	0	0	927
Gidi	1,157	72	0	0	1,229
Gidie	0	14	0	0	14
SCS	1,190	737	0	0	1,927
SanGo	609	53	0	0	662
emerging NEAR market	101	41	0	0	142
FCP	546	186	0	0	732
API	1,452	708	0	0	2,160
Gidon	11	0	0	0	11
BookLocker	330	79	0	0	409
ADIR	304	63	0	0	367
Flashcp	447	147	0	0	594
USB	3,178	2,857	0	0	6,035
device NEAR identifier	5	7	0	0	12
manufacturing NEAR flow	120	13	0	0	133
book NEAR(2) locker	6	32	0	0	38
device NEAR identification	10	13	0	0	23
Danh	0	1	0	0	1
U3	1,456	2,543	0	0	3,999
SPA	2	92	0	0	94
Discretix	201	180	0	0	381
Harkabi	443	108	0	0	551
Firmware	3,912	3,079	0	0	6,991
MDRM	77	109	0	0	186
gold	99	18	0	0	117

Harkabi v. SanDisk
Carlos Gonzalez Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	190	865	0	0	1,055
Cruzer	1,623	2,440	0	0	4,063
Secure NEAR content	77	167	0	0	244
earn-out	0	3	0	0	3
Gidi	410	68	0	0	478
Gidie	0	4	0	0	4
SCS	100	1,236	0	0	1,336
manufacturing NEAR flow	272	116	0	0	388
SanGo	29	55	0	0	84
device NEAR identifier	12	11	0	0	23
MDRM	123	75	0	0	198
API	958	1,554	0	0	2,512
Gidon	3	3	0	0	6
earn NEAR(2) out	1	5	0	0	6
BookLocker	38	843	0	0	881
ADIR	634	1,348	0	0	1,982
Flashcp	85	835	0	0	920
USB	8,415	8,154	0	0	16,569
FCP	25	709	0	0	734
Earnout	11	3	0	0	14
book NEAR(2) locker	0	6	0	0	6
device NEAR identification	38	26	0	0	64
Danh	0	1	0	0	1
U3	3,848	13,568	0	0	17,416
SPA	21	1,600	0	0	1,621
Discretix	140	137	0	0	277
Harkabi	1,228	57	0	0	1,285
emerging NEAR market	43	596	0	0	639
Firmware	11,745	4,317	0	0	16,062
Elazar	335	42	0	0	377
gold	339	249	0	0	588

Harkabi v. SanDisk
Cathy Lego Search Results

Keyword	Message	Attachment	Files	Directory	Total
SCS	1	19	0	0	20
Secure NEAR content	0	17	0	0	17
earn-out	1	9	0	0	10
Gidi	1	1	0	0	2
emerging NEAR market	0	28	0	0	28
MDRM	7	22	0	0	29
API	0	19	0	0	19
earn NEAR(2) out	1	15	0	0	16
BookLocker	6	3	0	0	9
ADIR	0	1	0	0	1
Gidon	0	6	0	0	6
USB	16	98	0	0	114
FCP	0	11	0	0	11
Earnout	6	1	0	0	7
gold	3	9	0	0	12
Cruzer	0	41	0	0	41
U3	5	171	0	0	176
Harkabi	5	15	0	0	20
Firmware	1	50	0	0	51
Elazar	1	6	0	0	7
SPA	0	9	0	0	9

Harkabi v. SanDisk

Eli Harari Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	6	26	0	0	32
Cruzer	1,122	1,924	0	0	3,046
Secure NEAR content	137	367	0	0	504
earn-out	17	24	0	0	41
Gidi	384	44	0	0	428
SCS	103	1,618	0	0	1,721
manufacturing NEAR flow	6	29	0	0	35
SanGo	13	6	0	0	19
device NEAR identifier	2	1	0	0	3
MDRM	153	187	0	0	340
API	42	1,477	0	0	1,519
Gidon	6	107	0	0	113
earn NEAR(2) out	31	27	0	0	58
BookLocker	80	105	0	0	185
ADIR	194	325	0	0	519
Flashcp	46	14	0	0	60
USB	7,309	13,760	0	0	21,069
FCP	0	1,067	0	0	1,067
Earnout	23	9	0	0	32
device NEAR identification	3	22	0	0	25
Danh	0	12	0	0	12
U3	902	17,398	0	0	18,300
SPA	55	1,207	0	0	1,262
Discretix	94	74	0	0	168
Harkabi	1,201	268	0	0	1,469
emerging NEAR market	87	777	0	0	864
Firmware	873	2,819	0	0	3,692
Elazar	358	122	0	0	480
gold	467	447	0	0	914

Harkabi v. SanDisk
Gidon Elazar Search Results

Keyword	Message	Attachment	Files	Directory	Total
Elazar	5	0	0	0	5
SCS	2	0	0	0	2
Gidi	3	0	0	0	3
Gidon	4	0	0	0	4
Harkabi	4	0	0	0	4

Harkabi v. SanDisk
Judy Bruner Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	7	14	0	0	21
Cruzer	2,064	5,345	0	0	7,409
Secure NEAR content	158	599	0	0	757
earn-out	82	74	0	0	156
Gidi	613	99	0	0	712
Gidie	0	2	0	0	2
SCS	329	4,609	0	0	4,938
manufacturing NEAR flow	45	51	0	0	96
SanGo	24	36	0	0	60
emerging NEAR market	160	1,135	0	0	1,295
MDRM	894	1,930	0	0	2,824
API	30	1,846	0	0	1,876
Gidon	19	190	0	0	209
earn NEAR(2) out	106	144	0	0	250
BookLocker	242	290	0	0	532
ADIR	205	1,129	0	0	1,334
Flashcp	54	41	0	0	95
USB	9,780	18,990	0	0	28,770
FCP	0	1,261	0	0	1,261
Earnout	118	97	0	0	215
book NEAR(2) locker	11	10	0	0	21
device NEAR identification	8	26	0	0	34
Danh	0	4	0	0	4
U3	2,051	27,526	0	0	29,577
SPA	507	2,720	0	0	3,227
Discretix	142	302	0	0	444
Harkabi	1,957	2,161	0	0	4,118
Firmware	605	5,958	0	0	6,563
Elazar	579	257	0	0	836
gold	441	528	0	0	969

Harkabi v. SanDisk
Kevin Zhang Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	343	419	0	0	762
Cruzer	8,038	5,329	0	0	13,367
Secure NEAR content	38	213	0	0	251
Elazar	209	5	0	0	214
Gidi	424	127	0	0	551
Gidie	0	3	0	0	3
SCS	680	361	0	0	1,041
SanGo	1,123	503	0	0	1,626
device NEAR identifier	0	12	0	0	12
MDRM	1,228	2,082	0	0	3,310
API	669	1,554	0	0	2,223
manufacturing NEAR flow	476	140	0	0	616
BookLocker	230	99	0	0	329
ADIR	3,594	1,903	0	0	5,497
Flashcp	55	114	0	0	169
USB	40,263	13,012	0	0	53,275
FCP	963	537	0	0	1,500
book NEAR(2) locker	25	92	0	0	117
device NEAR identification	0	43	0	0	43
Danh	0	3	0	0	3
U3	12,659	10,609	0	0	23,268
SPA	82	225	0	0	307
Discretix	11	265	0	0	276
Harkabi	66	0	0	0	66
Firmware	12,071	5,110	0	0	17,181
gold	505	182	0	0	687

Harkabi v. SanDisk
Megan Comport Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	0	9	0	0	9
Cruzer	258	656	0	0	914
Secure NEAR content	118	273	0	0	391
earn-out	77	74	0	0	151
Gidi	212	100	0	0	312
Gidie	0	4	0	0	4
SCS	121	352	0	0	473
manufacturing NEAR flow	18	17	0	0	35
SanGo	2	27	0	0	29
emerging NEAR market	8	181	0	0	189
MDRM	554	564	0	0	1,118
API	2	345	0	0	347
Gidon	14	96	0	0	110
earn NEAR(2) out	91	177	0	0	268
BookLocker	30	40	0	0	70
ADIR	3	35	0	0	38
Flashcp	0	21	0	0	21
USB	764	1,997	0	0	2,761
FCP	0	198	0	0	198
Earnout	142	16	0	0	158
book NEAR(2) locker	0	5	0	0	5
device NEAR identification	0	2	0	0	2
Danh	0	1	0	0	1
U3	327	3,303	0	0	3,630
SPA	202	431	0	0	633
Discretix	3	37	0	0	40
Harkabi	276	351	0	0	627
Firmware	82	575	0	0	657
Elazar	175	123	0	0	298
gold	229	55	0	0	284

Harkabi v. SanDisk
Micky Holtzman Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	120	351	0	0	471
Cruzer	234	222	0	0	456
Secure NEAR content	360	409	0	0	769
earn-out	0	1	0	0	1
Gidi	611	64	0	0	675
Gidie	0	5	0	0	5
SCS	243	439	0	0	682
manufacturing NEAR flow	170	37	0	0	207
SanGo	27	44	0	0	71
device NEAR identifier	25	37	0	0	62
MDRM	29	44	0	0	73
API	1,262	891	0	0	2,153
Gidon	1	15	0	0	16
earn NEAR(2) out	0	1	0	0	1
BookLocker	82	28	0	0	110
ADIR	259	164	0	0	423
Flashcp	30	23	0	0	53
USB	2,866	1,729	0	0	4,595
FCP	73	155	0	0	228
Earnout	4	1	0	0	5
book NEAR(2) locker	0	3	0	0	3
device NEAR identification	45	52	0	0	97
Danh	0	4	0	0	4
U3	1,224	2,527	0	0	3,751
SPA	10	135	0	0	145
Discretix	396	293	0	0	689
Harkabi	511	52	0	0	563
emerging NEAR market	141	89	0	0	230
Firmware	2,508	1,273	0	0	3,781
Elazar	522	56	0	0	578
gold	352	57	0	0	409

Harkabi v. SanDisk
Mike Morganstern Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	6	17	0	0	23
Cruzer	1,839	7,075	0	0	8,914
Secure NEAR content	15	24	0	0	39
Elazar	96	6	0	0	102
Gidi	98	7	0	0	105
SCS	13	396	0	0	409
SanGo	20	1,711	0	0	1,731
emerging NEAR market	14	83	0	0	97
FCP	8	463	0	0	471
API	10	812	0	0	822
Gidon	0	2	0	0	2
BookLocker	11	607	0	0	618
ADIR	137	3,576	0	0	3,713
Flashcp	9	569	0	0	578
USB	9,588	13,496	0	0	23,084
device NEAR identifier	0	1	0	0	1
manufacturing NEAR flow	15	9	0	0	24
device NEAR identification	0	4	0	0	4
Danh	0	2	0	0	2
U3	708	15,261	0	0	15,969
SPA	24	1,140	0	0	1,164
Discretix	0	3	0	0	3
Harkabi	508	15	0	0	523
Firmware	3,476	6,580	0	0	10,056
MDRM	6	20	0	0	26
gold	255	2,543	0	0	2,798

Harkabi v. SanDisk
Nelson Chan Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	7	1	0	0	8
Cruzer	692	682	0	0	1,374
Secure NEAR content	75	69	0	0	144
earn-out	2	0	0	0	2
Gidi	284	14	0	0	298
SCS	50	374	0	0	424
manufacturing NEAR flow	1	1	0	0	2
SanGo	10	12	0	0	22
device NEAR identifier	2	0	0	0	2
MDRM	19	88	0	0	107
API	170	182	0	0	352
Gidon	0	10	0	0	10
earn NEAR(2) out	5	0	0	0	5
BookLocker	45	98	0	0	143
ADIR	60	131	0	0	191
Flashcp	36	12	0	0	48
USB	1,827	2,087	0	0	3,914
FCP	3	186	0	0	189
Earnout	0	6	0	0	6
book NEAR(2) locker	18	1	0	0	19
device NEAR identification	14	2	0	0	16
Danh	0	3	0	0	3
U3	285	2,217	0	0	2,502
SPA	318	303	0	0	621
Discretix	12	21	0	0	33
Harkabi	783	139	0	0	922
emerging NEAR market	140	86	0	0	226
Firmware	424	451	0	0	875
Elazar	280	12	0	0	292
gold	578	52	0	0	630

Harkabi v. SanDisk
Rich Chernicoff

Keyword	Message	Attachment	Files	Directory	Total
SCS	13	1	0	0	14
Secure NEAR content	15	0	0	0	15
earn-out	3	0	0	0	3
Gidi	104	0	0	0	104
emerging NEAR market	1	0	0	0	1
API	5	3	0	0	8
manufacturing NEAR flow	2	0	0	0	2
earn NEAR(2) out	3	0	0	0	3
MDRM	328	0	0	0	328
ADIR	2	2	0	0	4
Gidon	2	0	0	0	2
USB	63	5	0	0	68
BookLocker	41	0	0	0	41
gold	6	0	0	0	6
Cruzer	10	0	0	0	10
U3	151	27	0	0	178
Discretix	16	0	0	0	16
Harkabi	131	0	0	0	131
Firmware	9	1	0	0	10
Elazar	53	0	0	0	53
SPA	46	2	0	0	48

Harkabi v. SanDisk
Sanjay Mehrotra Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	10	28	0	0	38
Cruzer	1,787	3,005	0	0	4,792
Secure NEAR content	118	297	0	0	415
earn-out	12	3	0	0	15
Gidi	361	36	0	0	397
SCS	109	1,706	0	0	1,815
manufacturing NEAR flow	9	39	0	0	48
SanGo	25	24	0	0	49
device NEAR identifier	2	2	0	0	4
MDRM	92	160	0	0	252
API	41	1,466	0	0	1,507
Gidon	5	77	0	0	82
earn NEAR(2) out	26	8	0	0	34
BookLocker	67	120	0	0	187
ADIR	201	557	0	0	758
Flashcp	42	21	0	0	63
USB	12,015	15,569	0	0	27,584
FCP	1	1,073	0	0	1,074
Earnout	19	7	0	0	26
book NEAR(2) locker	0	1	0	0	1
device NEAR identification	3	61	0	0	64
Danh	0	7	0	0	7
U3	816	18,862	0	0	19,678
SPA	86	1,573	0	0	1,659
Discretix	68	61	0	0	129
Harkabi	1,234	268	0	0	1,502
emerging NEAR market	99	704	0	0	803
Firmware	3,424	5,305	0	0	8,729
Elazar	335	88	0	0	423
gold	466	484	0	0	950

Harkabi v. SanDisk
Sean Chang Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	151	244	0	0	395
SCS	155	217	0	0	372
Secure NEAR content	37	15	0	0	52
earn-out	0	1	0	0	1
Gidi	478	56	0	0	534
Gidie	0	5	0	0	5
manufacturing NEAR flow	6	11	0	0	17
SanGo	43	13	0	0	56
device NEAR identifier	3	3	0	0	6
MDRM	39	119	0	0	158
API	4,567	1,274	0	0	5,841
Gidon	2	0	0	0	2
earn NEAR(2) out	0	1	0	0	1
BookLocker	71	28	0	0	99
ADIR	1,231	236	0	0	1,467
Flashcp	33	14	0	0	47
USB	6,174	1,875	0	0	8,049
FCP	343	525	0	0	868
Earnout	10	1	0	0	11
book NEAR(2) locker	2	9	0	0	11
device NEAR identification	0	14	0	0	14
Cruzer	202	212	0	0	414
U3	3,291	2,942	0	0	6,233
SPA	44	105	0	0	149
Discretix	1,214	91	0	0	1,305
Harkabi	291	3	0	0	294
emerging NEAR market	43	34	0	0	77
Firmware	19,687	2,814	0	0	22,501
Elazar	394	11	0	0	405
gold	231	28	0	0	259

Harkabi v. SanDisk
Vladimir Zininberg Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	256	784	0	0	1,040
SCS	472	593	0	0	1,065
Secure NEAR content	139	789	0	0	928
earn-out	0	2	0	0	2
Gidi	488	288	0	0	776
Gidie	0	2	0	0	2
SanGo	230	28	0	0	258
device NEAR identifier	4	6	0	0	10
MDRM	127	56	0	0	183
API	2,056	2,835	0	0	4,891
manufacturing NEAR flow	285	96	0	0	381
earn NEAR(2) out	0	2	0	0	2
BookLocker	123	42	0	0	165
ADIR	378	582	0	0	960
Flashcp	26	52	0	0	78
USB	7,741	5,178	0	0	12,919
FCP	96	375	0	0	471
Earnout	16	2	0	0	18
book NEAR(2) locker	10	4	0	0	14
device NEAR identification	6	22	0	0	28
Cruzer	386	523	0	0	909
U3	1,696	4,433	0	0	6,129
SPA	51	204	0	0	255
Discretix	58	638	0	0	696
Harkabi	28	8	0	0	36
emerging NEAR market	231	120	0	0	351
Firmware	5,935	4,646	0	0	10,581
Elazar	335	24	0	0	359
gold	684	131	0	0	815

Harkabi v. SanDisk
Yoram Cedar Search Results

Keyword	Message	Attachment	Files	Directory	Total
device NEAR ID	13	143	0	0	156
Cruzer	1,040	3,837	0	0	4,877
Secure NEAR content	278	518	0	0	796
earn-out	27	14	0	0	41
Gidi	653	127	0	0	780
Gidie	0	2	0	0	2
SCS	284	2,250	0	0	2,534
manufacturing NEAR flow	61	28	0	0	89
SanGo	33	45	0	0	78
device NEAR identifier	2	10	0	0	12
MDRM	303	181	0	0	484
API	332	1,495	0	0	1,827
Gidon	5	80	0	0	85
earn NEAR(2) out	34	14	0	0	48
BookLocker	118	96	0	0	214
ADIR	268	916	0	0	1,184
Flashcp	60	38	0	0	98
USB	8,492	14,606	0	0	23,098
FCP	2	751	0	0	753
Earnout	36	10	0	0	46
book NEAR(2) locker	6	4	0	0	10
device NEAR identification	8	37	0	0	45
Danh	0	12	0	0	12
U3	1,216	19,129	0	0	20,345
SPA	52	1,221	0	0	1,273
Discretix	321	105	0	0	426
Harkabi	1,543	1,025	0	0	2,568
emerging NEAR market	142	510	0	0	652
Firmware	5,582	6,483	0	0	12,065
Elazar	579	133	0	0	712
gold	396	502	0	0	898

EXHIBIT 3

Daniel V. Shapiro

From:	Frank, Lauren [lfrank@omm.com]
Sent:	Tuesday, April 14, 2009 7:07 PM
To:	Daniel V. Shapiro
Cc:	James Mitchell; Bachman, Charles E.
Subject:	RE: Harkabi v. SanDisk Keyword Search Report

Hi Daniel,

1) I have been told that SanDisk did not have an archiving system before
2007. Employees had been instructed to save their documents into local
hard drives but if they did not do that, then the documents may be lost.
In addition, when an employee leaves the company, he typically returns
his computer/lap top and the device gets recycled 30 days later. The
information on the device is supposed to be transmitted before it is
emptied but it is possible this did not occur with the 4 custodians
you've identified, which includes Mr. Harkabi.

2) I confirmed that the vendor ran the search terms for the custodians
in the body of the text, so if Mr. Elazar signed his name (either first
or last) then it would return a hit. Unfortunately, as stated above, the
larger issue seems to be that if the communications came before 2007,
then it is very possible that the messages were never archived into the
system.

3) Search terms have only been applied to e-mail at this point, so files
and directories have not yet been searched. It is also worth noting that
the number of documents to review will increase when those searches are
completed. My apologies for the confusion.

Thanks,
Lauren

-----Original Message-----
From: Daniel V. Shapiro [mailto:dshapiro@stillmanfriedman.com]
Sent: Tuesday, April 14, 2009 3:39 PM
To: Frank, Lauren
Cc: James Mitchell; Bachman, Charles E.
Subject: RE: Harkabi v. SanDisk Keyword Search Report

Lauren,

We have reviewed the spreadsheet and, if we are reading it correctly,
have a couple of initial questions.

1) Can you explain why the report says that there was "no email located"
for Dan Harkabi, Steve Nedeels, Tony Awal, and Orna Zarfati?

2) The search of Gidi Elazar's email appears to have returned only 5
hits for the term "Elazar" and only 18 hits for all of the search terms
combined. Keeping in mind that the term "Elazar" would be in every email
that he sent, this seems to suggest that the universe of his email that

was searched was only 5 messages. Can you explain why this is so?

3) We see that there are 0 hits for files and 0 hits for directories. This does not seem possible. Can you explain why the search terms returned 0 hits in the electronic files of these custodians (other than their email)? Did you in fact search the electronic files of these custodians?

Please let us know if we are reading the spreadsheet incorrectly.

Daniel V. Shapiro
Stillman, Friedman & Shechtman, P.C.
425 Park Avenue, New York, NY 10022
(212) 223-0200 | www.stillmanfriedman.com

-----Original Message-----
From: Frank, Lauren [mailto:lfrank@omm.com]
Sent: Monday, April 13, 2009 4:07 PM
To: Daniel V. Shapiro
Cc: James Mitchell; Bachman, Charles E.
Subject: FW: Harkabi v. SanDisk Keyword Search Report

Daniel,

Please see the attached report prepared by an outside vendor. It includes both a summary report and reports by custodian.

Please let me know if you have any questions.

Thanks,
Lauren

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